

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT S. JOHNSON,

Defendant.

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No. 08-CR-50013

**AMENDED PETITION TO EXTEND BOND CONDITIONS TO PERMIT
TRAVEL WITH THE STATE OF TEXAS**

NOW COMES the defendant, ROBERT S. JOHNSON, by his attorneys, SREENAN & CAIN, P.C., RANDY WILT, and moves this Court to expand the conditions of his bond to permit him to travel to the Southern District of Texas. In support hereof, it is stated as follows:

1. Defendant is pending in the Northern District of Illinois on charges involving Lacey Act violations. 16 USC § 3372 and 3373.

2. That at the time of arraignment on March 25, 2008, Defendant was given permission to reside in San Marcos, Texas, conditioned upon his being monitored by a pretrial officer in the Western Division of Texas.

3. Defendant has been advised that absent an Order of this Court, he will not be permitted to travel outside the Western Division.

4. Defendant's estranged wife, Connie Johnson, resides in Laguna Vista, Texas. Defendant's accountant is located in Port Isabel, Texas. Defendant's daughter is a student at Texas A & M in College Station, Texas. All three locations are within the Southern District of Texas.

5. Defendant needs permission to travel to the Southern District of Texas on a periodic basis to attend to business and family matters and to visit family members.

6. That counsel for the defendant has spoken with Assistant United States Attorney Joseph Pederson, who advises that he has no objection to the expansion of Defendant's bond as requested.

7. That on April 9, 2008, Defendant's counsel spoke with Traci Fegre of the United States Pretrial Services Office and was advised that she has no objection to Defendant's request under the following conditions:

- a. Defendant be required to notify Pretrial Services of the dates, times, and locations of any such trips into the Southern District of Texas.
- b. Pretrial Services is granted the authority to consent to or deny each such request without seeking individual, separate permission from the Court for each request received.

WHEREFORE, the defendant, ROBERT S. JOHNSON, prays this Court modify his bond to permit him to travel to the Southern and Eastern Districts of Texas.

ROBERT S. JOHNSON, Defendant,

By: s/
RANDY WILT, Attorney at Law

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